

REMARKS

Claim 1 has been amended to incorporate therein the subject matter of claims 7 and 8, together with the limitation that the light sources are arranged as a series of elongate rows, each elongate row defining at least one row of pixels of the display; this latter limitation is based, *inter alia*, on Paragraph [0080] and Figure 6 of the application. Claim 6 has been cancelled as inconsistent with claim 1 as now amended, and claims 7 and 8 have been cancelled as redundant over amended claim 1. Claim 9 has been amended to remove therefrom matter already present in amended claim 1, to depend from claim 1 instead of from cancelled claim 7, and to refer to plural light valves and light sources for consistency with amended claim 1. Claim 12 has been amended to remove therefrom matter already present in amended claim 1, while claim 13 has been cancelled as inconsistent with amended claim 1. Claim 14 has been amended consequent upon the references to plural light valves and light sources in claim 9. Claims 21 and 22-30 have been cancelled in view of the restriction requirement, and claim 22 amended in the same manner as claim 1.

New claims 31-37 have been added to give applicants the scope of patent protection to which they believe themselves entitled. Specifically, claim 31 is directed to an electronic display (200, 230, 240, 250 - see Figures 6-10) comprising an electro-optic material (208 in Figure 6) having a plurality of pixels, a photoconductor (210) disposed adjacent the electro-optic material (208) and a plurality of light sources (202) associated with the photoconductor (206) and selectively operable to switch the photoconductor (206) between a conductive and a non-conductive state, the light sources (202) being arranged as a series of elongate rows (r1, r2, r3, r4), each elongate row defining at least one row of pixels of the display. It is believed that the foregoing references to the drawings adequately set forth the basis for new claim 31. Claims 32 and 33 are directed to an electronic display of claim 31 having the features of claims 8 and 9 respectively. Claim 34 is directed to an electronic display of claim 31 having an electrode (210 in Figure 6) disposed on the opposed side of the electro-optic material (208) from the

photoconductor (206). Claim 35 is directed to an electronic display according to claim 34 wherein the electrode (210) is patterned into a plurality of elongate elements (c1, c2 etc. in Figures 7-10), the display further comprising means for applying different potentials to differing ones of the elongate elements of the electrode (see Paragraphs [0081]-[0082]; individually selectable columns necessarily have means for applying different potentials to different columns). Claim 36 is directed to an electronic display according to claim 32 wherein the light valves are arranged as a series of elongate elements extending parallel to the elongate light sources (cf. Figures 9 and 10). Finally, claim 37 is directed to an electronic display according to claim 32 wherein the elongate elements of the light valves differ in width from the elongate light sources, such that a plurality of one of the light valves and light sources are contained within the area of one of the other of the light valves and the light sources (again, cf. Figures 9 and 10).

No new matter is introduced by any of the amendments discussed above.

In response to Paragraph 1 of the Office Action, the applicants respectfully take issue with the statement that "Because applicant did not distinctly and specifically point out the supposed errors in the restriction requirement, the election has been treated as an election without traverse". In the previous Office Action, the Examiner required election among the species of Figures 1-10 on the grounds that there was no generic claim. In their Response, applicants elected the species of Figure 6 but traversed to election requirement on the grounds that claim 1 was generic to all the species of Figures 1-10. Accordingly, the applicants did point out the error in the election requirement and the election should not be treated as one without traverse.

However, some modification of applicants' previous position is required in view of the amendments to the claims, since the claims are now directed only to the species of Figures 6-10. More specifically, the correspondence between the remaining claims and species is as follows:

<u>Claim No.</u>	<u>Species of Figures</u>
1-5, 9-11	6-10
12	6-8
14	6-10
15	8
16-20	6-10
22	6-10
31-32	6-10
33	6-8
34	6-10
35	7-10
36	9-10

In response to Paragraph 3 of the Office Action, the title has been amended to "Electronic display with photo-addressing means" which is believed to be clearly descriptive of the invention claimed. If the Examiner is not satisfied with this amended title, he is invited to telephone the undersigned attorney so that a mutually acceptable title can be agreed.

With regard to Paragraph 4 of the Office Action, the Examiner's attention is respectfully directed to the fact that the present application was filed electronically, so that the formatting of the claim numbers was determined by the PASAT software supplied by the Office, not by the undersigned attorney. However, in deference to the Examiner's objections, the rewritten claims presented above are numbered in the normal manner; this change in formatting of the claim numbers is *not* marked as an amendment of the claims.

The 35 USC 102 rejection of claims 1, 7-12, 17-18 and 20 as unpatentable under 35 USC 102(b) as anticipated by Jacobson, WO 97/04398 (insofar as still applicable) is traversed. More specifically, this rejection is traversed on the grounds that Jacobson does not describe an electronic display having a plurality of light sources associated with a photoconductor and selectively operable to switch the photoconductor

between a conductive and a non-conductive state, the light sources being arranged as a series of elongate rows, each elongate row defining at least one row of pixels of the display.

In the paragraph bridging pages 4 and 5 of the Office Action, it is stated that Jacobson teaches a plurality of light sources (electroluminescent 780 or optical fiber 804) arranged as a series of elongate rows and a plurality of light valves arranged as series of elongate columns crossing the elongate rows, the light sources and light valves together defining a two-dimensional array of pixels in the photoconductor, and attention is directed to Figure 10 and page 7, lines 23-25 of Jacobson. With respect, this is not what the cited passage of Jacobson teaches. The description of Figures 9 and 10 on pages 20 and 21 of Jacobson teaches that the devices shown in Figures 9 and 10 are switches and alternatives to the transistors typically used in active matrix displays and formed by "standard semiconductor technology". The devices shown in Figures 9 and 10 function only as single switches in the same manner as regular transistors and have a single input electrode 510 and a single output electrode 520. There is no suggestion in Jacobson of a plurality of light sources arranged as a series of elongate rows operable to switch a photoconductor; the only light sources and photoconductors disclosed in Jacobson are confined within a switching device, and are not used directly for switching an electronic display, as in the present claims. The passage on page 7 to which the Examiner refers is not to the contrary, but simply lists types of electro-optic media which may be used with such switches.

The new claims 31-37 are patentable over the references of record for the same reasons as claim 1, namely that none of the references describe an electronic display having a plurality of light sources associated with a photoconductor and selectively operable to switch the photoconductor between a conductive and a non-conductive state, the light sources being arranged as a series of elongate rows, each elongate row defining at least one row of pixels of the display.

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The 35 USC 103 rejection of claim 15 as unpatentable over Jacobson in view of Drzaic, WO 99/53373, is traversed for the same reasons as the 35 USC 102 discussed above. Drzaic does nothing the remedy the deficiencies in Jacobson already mentioned

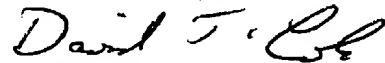
For all the foregoing reasons, the 35 USC 102 and 103 rejections are unjustified and should be withdrawn.

Reconsideration and allowance of all claims now present is respectfully requested.

No additional claim fees are required in connection with this Amendment.

Since the normal period for responding to the Office Action expired September 2, 2004, there is filed herewith a Petition for a one month extension of this period

Respectfully submitted



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